

## REMARKS

Applicants respectfully request reconsideration of the present application. In this Preliminary Amendment, no claims have been cancelled and new claims 59-67 have been added. As such, claims 1-16, 17-23, and 59-67 are pending in the present application.

### Claim Rejections Under 35 USC 103

In the Final Office Action dated June 28, 2007, the claims 1 through 12 were rejected under 35 USC section 103(a) as being unpatentable over U.S. Patent No. 6,098,066 to Snow et al. (hereinafter "Snow") in view of U.S. Patent App. No. 2001/0049677 A1 to Talib et al (hereinafter "Talib"). Applicants respectfully submit that Snow and Talib, taken alone or in combination, fail to teach, suggest, or render obvious the present invention as claimed.

As amended, claim 1 recites a method for searching a content database including a plurality of records each containing multiple field types within a set of field types, the method comprising the steps of:

maintaining a structure database in computer storage in which the set of field types are organized into zero or more categories and a plurality of sub-categories, each category having zero or more sub-categories, the structure database containing, for each record, record relationship information indicating categories and sub-categories of the multiple field types of the record and category and sub-category relationships of the multiple field types of the record;

receiving a search query comprising a selection of multiple field types within the set of field types;

determining query relationship information indicating categories and sub-categories of the multiple field types of the search query and category and sub-category relationships of the multiple field types of the search query;

performing a correlation between the query relationship information and the record relationship information for one or more

records to produce a relevance value for each of the one or more records;  
and

as a response to the query, selecting information from records in the content database based upon the relevance values for the one or more records.

(Emphasis added).

Snow discloses a method and apparatus for performing a partitioned search within a document directory hierarchy having classified documents. Snow, however, fails to teach or suggest each limitation of claim 1. For example, Snow does not teach or suggest determining query relationship information indicating categories and sub-categories of the multiple field types of the search query and category and sub-category relationships of the multiple field types of the search query and performing a correlation between the query relationship information and the record relationship information for one or more records to produce a relevance value for each of the one or more records, as required in claim 1.

As disclosed in Snow, the method and apparatus for performing a partitioned search within a document directory hierarchy does not include or pertain to determining query relationship information indicating categories and sub-categories and category and sub-category relationships of multiple field types of the search query. As such, Snow also does not disclose or suggest performing a correlation between the query relationship information and the record relationship information for a record to produce a relevance value, as required in claim 1. Talib discloses systems and methods for retrieval of information from document archives. Talib does not remedy the deficiencies of Snow. As such, neither Snow nor Talib, alone or in combination, teach or suggest each limitation of claim 1.

Thus, Applicants respectfully submit that independent claim 1 is allowable over Snow and Talib, taken alone or in combination. Claims 2-5 are dependent upon claim 1 and thus are also in allowable form. Independent claim 6 is a system claim reciting

limitations similar to claim 1 and is allowable for at least the same reasons as claim 1. Claims 7-12 are dependent upon claim 6 and thus are also in allowable form.

Claims 13-16 and 18-23 were rejected under 35 USC section 103(a) as being unpatentable over U.S. Patent No. 6,275,811 to Ginn et al. (hereinafter “Ginn”) in view of PCT Patent Application WO01/61601 A1 to Knepfle et al (hereinafter “Knepfle”) in view of Snow, and further in view of Talib. Claim 13 contains the “determining query relationship information” and “performing a correlation” limitations of claim 1. Applicants respectfully submit that Ginn and Knepfle, taken alone or in combination, do not cure the deficiencies of Snow and Talib in teaching or suggesting these limitations. As such, claim 13 is also in allowable form. Claims 14-16 and 18-23 are dependent upon claim 13 and thus are also in allowable form.

#### **New Claims 59-67**

New claims 59-67 have been added. Claims 59-61 are dependent upon claim 1 and thus are in allowable form. Claims 62-64 are dependent upon claim 6 and thus are in allowable form. Claims 65-67 are dependent upon claim 13 and thus are in allowable form.

Also, none of the cited references, alone or in combination, teach or suggest the additional limitations of the new claims. For example, claim 59 recites the method of claim 1, wherein the relevance value for a record indicates a degree of similarity between the categories and sub-categories of the search query and the categories and sub-categories of the record. Claim 60 recites the method of claim 1, wherein a maximum relevance value for a record indicates that all categories and sub-categories of the search query are found in the categories and sub-categories of the record; and a sub-maximum relevance value for a record indicates that some but not all categories and sub-categories of the search query are found in the categories and sub-categories of the record. Claim 61 recites the method of claim 1, wherein a relevance value for at least one record indicates that some but not all

categories and sub-categories of the search query are found in the categories and sub-categories of the record. None of the cited references, alone or in combination, teach or suggest these additional limitations. Applicants respectfully request that the Examiner cite the precise portions of the cited references that disclose these additional limitations.

In the unlikely event that the Patent Office determines that an extension and/or other relief is required, Applicants petition for any required relief including an extension of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. **50-1128** referencing TRAN.P0001.

### CONCLUSION

In view of the foregoing, Applicants respectfully believe that all pending claims are patentable and are in condition for allowance. Such allowance is earnestly solicited at the earliest possible date.

Respectfully submitted,

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